



N-METHYLPYRROLIDONE PRODUCERS GROUP, INC.

2200 PENNSYLVANIA AVENUE, N.W., SUITE 100W, WASHINGTON, D.C. 20037 • (202) 557-3800 • FAX (202) 557-3836

MANAGED BY B&C CONSORTIA MANAGEMENT, L.L.C.

December 10, 2019

Via E-Mail

Stan Barone, Ph.D.
Office of Pollution Prevention and Toxics (7403M)
Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460-0001

Re: Request for Extension of Public Comments on N-Methylpyrrolidone;
Draft Toxic Substances Control Act (TSCA) Risk Evaluation

Dear Dr. Barone:

The N-Methylpyrrolidone (NMP) Producers Group, Inc. (NMP Producers Group) respectfully requests that the U.S. Environmental Protection Agency (EPA) extend the deadline for public comment on the draft NMP Toxic Substances Control Act (TSCA) risk evaluation by an additional 30 days, with comments due no later than **February 5, 2020**.

Of paramount concern is the continued lack of communication from EPA on the critical issue regarding ownership rights for sponsored studies and the ability to protect those rights if those studies are provided to EPA for TSCA purposes. The NMP Producers Group initially contacted EPA on this issue in July 2019, with a subsequent detailed communication provided in August 2019. Since that time, we have been in touch with EPA staff at least once a month, requesting a response to our inquiry. To date, we have not received such a response. Given that the sponsored study reports in question could be a critical issue in the overall conclusions of EPA's risk assessment, it is imperative that we have sufficient time to carefully consider the yet-to-be issued response from EPA and how that may impact our advocacy position on the draft risk assessment. This effort will take a few weeks at best, during which we may need to confer with EPA staff. In the meantime, the NMP Producers Group continues to brainstorm on approaches that could provide EPA with the information that it requests while protecting the Group's ownership rights. This, too, will require interactions with EPA leadership and scientists. Given the end-of-year holiday period, we do not believe fruitful discussions with key EPA staff can reasonably occur, and hence, a short extension to the comment period is necessary.

Thank you for your consideration of this request.

Regards,

Kathleen M. Roberts
NMP Producers Group Manager

cc: Ms. Ana Corado (via e-mail)

{00609.002 / 111 / 00235633.DOC 1}

ED_006308_00000007-00001